

1 WILSHIRE LAW FIRM
2 Thiago Coelho, SBN 324715
3 thiago@wilshirelawfirm.com
4 Binyamin I. Manoucheri, SBN 336468
5 binyamin@wilshirelawfirm.com
6 Jasmine Behroozan, SBN 325761
7 jasmine@wilshirelawfirm.com
8 3055 Wilshire Blvd., 12th Floor
9 Los Angeles, California 90010
10 Tel: +213.381.9988
11 Fax: +213.381-9989

12 Attorneys for Plaintiff
13 DANIEL CERVANTES

14 MORGAN, LEWIS & BOCKIUS LLP
15 Kathy H. Gao, SBN 259019
16 kathy.gao@morganlewis.com
17 300 South Grand Avenue
18 Twenty-Second Floor
19 Los Angeles, CA 90071-3132
20 Tel: +1.213.612.2500
21 Fax: +1.213.612.2501

22 Attorneys for Defendant
23 BMW OF NORTH AMERICA, LLC

24 UNITED STATES DISTRICT COURT
25 EASTERN DISTRICT OF CALIFORNIA

26 DANIEL CERVANTES, individually and on
27 behalf of all others similarly situated,

28 Plaintiff,

vs.

BMW OF NORTH AMERICA, LLC, a
Delaware limited liability company; and
DOES 1 to 10, inclusive,

Defendants.

Case No. 2:21-cv-01807-TLN-KJN

[Hon. Troy L. Nunley]

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT BMW OF
NORTH AMERICA, LLC TO RESPOND
TO INITIAL COMPLAINT**

Complaint Served: October 6, 2021
Current Response Date: December 22, 2021
New Response Date: January 21, 2022

1 WHEREAS, Plaintiff Daniel Cervantes (“Plaintiff”) filed his Complaint on September 30,
2 2021;

3 WHEREAS, Defendant BMW of North America, LLC (“Defendant”) (Plaintiff and
4 Defendant collectively referred to as the “Parties”) was served on October 6, 2021 such that
5 Defendant’s current responsive pleading deadline is October 27, 2021;

6 WHEREAS, through the Parties’ prior stipulation, Defendant’s current response deadline
7 is December 22, 2021;

8 WHEREAS, Defendant is in the process of assessing Plaintiff’s allegations in this action
9 which is a time-consuming process given the highly technical nature of the allegations relating to
10 the accessibility of Defendant’s website. Defendant will need more time to complete its
11 assessment of Plaintiff’s allegations prior to responding to Plaintiff’s Complaint; and

12 WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to an
13 extension of time for Defendant to respond to Plaintiff’s Complaint.

14 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the
15 Parties’ respective counsel as follows:

16 Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be
17 extended to January 21, 2022.

18 Dated: December 21, 2021

WILSHIRE LAW FIRM

19 By /s/ Thiago Coelho

20 Thiago Coelho
21 Attorney for Plaintiff
DANIEL CERVANTES

22 Dated: December 21, 2021

MORGAN, LEWIS & BOCKIUS LLP

23 By /s/ Kathy H. Gao

24 KATHY H. GAO
25 Attorney for Defendant
26 BMW OF NORTH AMERICA, LLC
27
28

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: December 21, 2021

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO

Attorney for Defendant

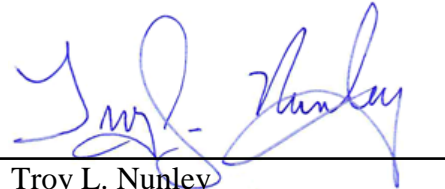
BMW OF NORTH AMERICA, LLC

ORDER

After considering the Parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to January 21, 2022.

IT IS SO ORDERED.

Dated: December 27, 2021



Troy L. Nunley
United States District Judge